REMARKS

Claims 1 through 3, 6, 7 and 9 through 25 are pending in the present application. Claims 4, 5 and 8 were previously canceled.

On November 23, 2004, Applicants conducted a teleconference with Examiner Ly. Applicants thank Examiner Ly for making time for the teleconference.

The Advisory Action indicates that the period for reply expires 3 months from the mailing date of the final rejection. Applicants respectfully disagree, and as explained below, request that the Office clarify the expiration date for the period for reply.

As mentioned above, the Office mailed the final Office Action on June 4, 2004. The Office Action set a period of three months for the reply, thus, targeting the period for reply to expire on September 4, 2004. Applicants mailed a response on August 4, 2004, i.e., within two months of the mailing date of the final Office Action. The Office mailed the Advisory Action on September 29, 2004.

Since Applicants mailed the response within two months of the mailing date of the final Office Action, the period for reply should expire on: (1) the mailing date of the Advisory Action, i.e., September 29, 2004, or (2) the date set forth in the final action, i.e., September 4, 2004, whichever is later. Therefore, the period for reply should expire on September 29, 2004.

Applicants are enclosing herewith a copy of an amendment transmittal for the response. The amendment transmittal includes a certificate of mailing dated August 4, 2004. Applicants respectfully request that the Office clarify that the period for reply should expire on September 29, 2004, and therefore that any extension periods should be calculated from the date of September 29, 2004.

In the Office Action, on page 3, section 7, claims 1 through 3, 6, 7 and 9 through 25 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,549,216 to Schumacher et al. (hereinafter "the Schumacher et al. patent") in view of U.S. Patent No. 6,502,102 to Haswell et al. (hereinafter "the Haswell et al. patent").

The application contains four independent claims, namely claims 1, 11, 16 and 21. During the aforementioned teleconference, Applicants described several points of distinction between the independent claims and the disclosures of the Schumacher et al. and Haswell et al. patents. In the present amendment, at the suggestion of Examiner Ly, Applicants clarified a recital in each of the four independent claims. Below, with reference to claim 11, Applicants are reiterating several of the points of distinction, and are explaining the clarification.

Claim 11 provides for a method. The method includes, *inter alia*, (a) identifying an occurrence of an event that occurs while a task is being accomplished to revise a file record, and (b) recording in a memory, a response to the event, wherein the response is performed by a human operator interacting with a graphical user interface. Applicants clarified that an event occurs, and that a response to the event is performed by a human operator.

The Schumacher et al. patent is directed toward testing software, such as, for example, **testing a Java platform** (col. 2, lines 7 – 11). It does not disclose identifying an occurrence of an event that occurs **while a task is being accomplished to revise a file record**, as recited in claim 11.

The Schumacher et al. patent is more specifically directed to a method for recording events that result from human interaction with various components of an applet (col. 2, lines 14 – 17). Thus, the Schumacher et al. patent **does not disclose a human responding to an event, but instead, discloses a human causing the event**. Consequently, the Schumacher et al. patent does not disclose (a) **identifying an occurrence of an event** that occurs while a task is being accomplished to revise a file record, and (b) recording in a memory, **a response to the event, wherein the response is performed by a human operator** interacting with a graphical user interface, both of which are recited in claim 11.

The Haswell et al. patent is directed to development of scripts (col. 1, lines 6 – 7). The scripts are developed through use of an English-based, form-driven interface (col. 7, line 47). More specifically, script data is received utilizing a language-driven interface, and the received script data is then translated into automation code (col. 16, lines 3 – 12).

Applicants submit that the Haswell et al. patent does not make up for the deficiencies of the Schumacher et al. patent as the Schumacher et al. patent relates to claim 11. That is, neither of the

Schumacher et al. patent nor the Haswell et al. patent disclose or suggest (a) identifying an occurrence of an event that occurs while a task is being accomplished to revise a file record, and (b) recording in a memory, a response to the event, wherein the response is performed by a human operator interacting with a graphical user interface, as recited in claim 11.

Moreover, the Schumacher et al. patent discloses recording events that result from interaction with the various components of an applet, whereas the Haswell et al. patent discloses that scripts are developed through use of an English-based, form-driven interface. These two techniques are each fundamental to the operation of their respective systems, yet they are drastically different from one another. Consequently, a combination of these references would (a) change the principle of operation of at least one of the references, or (b) render at least one of the references unsatisfactory for its intended purpose. Thus, the proposed combination of the Schumacher et al. patent and the Haswell et al. patent is **impermissible for purposes of a section 103(a) rejection.**

For the several reasons provided above, Applicants submit that claim 11 is patentable over the cited combination of the Schumacher et al. and Haswell et al. patents.

Each of independent claims 1, 16 and 21 include recitals similar to those of claim 11, as described above. Thus, for reasoning similar to that provided in support of claim 11, Applicants submit that claims 1, 16 and 21 are also patentable over the cited combination of references.

Claim 1 also includes several other recitals that further distinguishes claim 1 over the cited combination of references. More particularly, claim 1 provides for a process for automatically revising data in a database of file records stored in a computer. The process includes, *inter alia*, (a) selecting a batch of file records that require said task to be performed to execute revisions from a database of file records, (b) loading a specified task and said collection of emulated event handlers for such task into a computer; and (c) executing said task on said selected batch of file records by matching a member of said collection of emulated event handlers to a given event.

Applicants respectfully submit that neither of the Schumacher et al. patent nor the Haswell et al. patent disclose or suggest either of (i) **selecting a batch of file records that require a task to be performed to execute revisions from a database of file records,** or (ii) executing a task on a selected

batch of file records by **matching a member of a collection of emulated event handlers to a given event**, both of which are recited in claim 1.

Thus, claim 1 not only contains recitals similar to those of claim 11, but includes several additional recitals that further distinguish claim 1 over the cited combination of references.

Claims 2, 3, 6, 7, 9 and 10 depend from claim 1. Claims 12 through 15 depend from claim 11. Claims 17 through 20 depend from claim 16. Claims 22 through 25 depend from claim 21. By virtue of these dependencies, claims 2, 3, 6, 7, 9, 10, 12 through 15, 17 through 20 and 22 through 25 are all patentable over the cited combination of references.

Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claims 1 through 3, 6, 7, and 9 through 25.

As mentioned above, Applicants amended claims 1, 11, 16 and 21 to clarify a recital. The amendment to claims 1, 11, 16 and 21 does not narrow the meaning of any term of the claims, and as such, the doctrine of equivalents should be available for all of the elements of all of the claims.

In view of the foregoing, Applicants respectfully submit that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

Respectfully submitted,

November 29, 2004
Date

Charles N.J. Ruggiero, Esq.
Reg. No. 28,468
Attorney for the Applicants
Ohlandt, Greeley, Ruggiero & Perle, L.L.P.
One Landmark Square, 10th Floor
Stamford, CT 06901-2682
Tel: 203-327-4500
Fax: 203-327-6401